

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

CLERK OF DISTRICT COURT  
NORTHERN DIST. OF TX  
FORT WORTH DIVISION  
FILED

2019 JAN 18 PM 12:52

UNITED STATES OF AMERICA

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DEPUTY CLERK \_\_\_\_\_

v.

NO. 4:11-CR-151-A(01)

CRYSTAL MASON-HOBBS

**MOTION TO CONVERT REMAINING SENTENCE**

COMES NOW Crystal LaVon Mason-Hobbes, Defendant in the above-styled cause and moves the honorable Court to convert her sentence, allowing her to serve the remaining period of incarceration on home confinement. In furtherance, Ms. Mason-Hobbes would show the Court as follows.

I.

The Government moved to revoke Ms. Mason-Hobbes's supervised release on the grounds that Ms. Mason-Hobbes had been convicted in a Texas court of the felony offense of Illegal Voting. After a hearing, the Court revoked Ms. Mason-Hobbes's supervised release and handed down a sentence of ten months confinement and an additional period of supervised release. Ms. Mason self-surrendered to the Federal Bureau of Prisons on September 27, 2018 and is housed currently at FMC Carswell.

II.

The current shutdown of portions of the federal government has resulted in an ongoing staffing crisis at FMC Carswell, like many other federal prisons. Correctional officers, who are being asked to work without pay, are beginning to show signs of extreme financial stress, and those who were unwilling to work without pay are being joined by those who for financial reasons

are unable to work without pay. FMC Carswell, like many federal prisons, is operating at staffing levels that are sub-optimal, and if not already, could become unsafe in the near future.

As news reports are making very clear, the shutdown shows little promise of ending any time soon.

III.

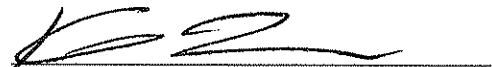
Crystal LaVon Mason Hobbes has already served almost four months of a ten month sentence. She is a nonviolent offender. She poses no apparent threat to the public at large and will be released soon notwithstanding.

IV.

Whereas Ms. Mason-Hobbes has no reason to be prioritized as a threat to the public, and whereas the men and women remaining in service without pay as correctional officers at FMC Carswell should be spared any unnecessary burden, Ms. Mason-Hobbes respectfully moves the Court to convert the remainder of her sentence of incarceration to home confinement.

WHEREFORE, for all the foregoing reasons, and for any other reasons this Court may deem just and proper, Crystal Mason-Hobbs, through undersigned counsel, respectfully requests that this Court convert the remainder of her sentence to be served under home confinement.

Respectfully submitted,



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A handwritten signature in black ink, appearing to read 'Allison Grinter', is written over a horizontal line.

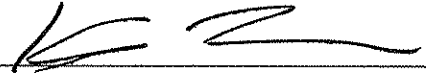
Allison Grinter  
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ATTORNEYS FOR DEFENDANT

**CERTIFICATE OF CONFERENCE**

I certify that on the 18<sup>th</sup> day of January, 2019, I conferred with Assistant U.S. Attorney Megan Fahey. The government ~~does not oppose this motion.~~

*has not yet responded.*

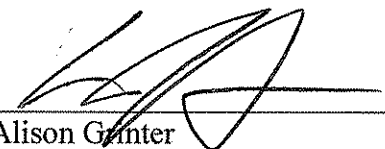
  
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Kim T. Cole

  
\_\_\_\_\_  
Alison Grinter

**CERTIFICATE OF SERVICE**

I certify that on the 18<sup>th</sup> day of January, 2019, a copy of the foregoing was provided to Megan Fahey of the United States Attorney's Office, 801 Cherry Street, Suite 1700, Fort Worth, Texas 76102.

  
\_\_\_\_\_  
Kim T. Cole

  
\_\_\_\_\_  
Alison Grinter